

Approved by:


JULIA MCCORMICK

Special Assistant United States Attorney

 ORIGINAL

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

20 MAR 23 00

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UNITED STATES OF AMERICA

-v-

JORDAN PAPACHARALAMBOUS

Defendant

: MISDEMEANOR
: COMPLAINT

: Violation of

: NYVATL 511(1)(a)

: COUNTY OF OFFENSE:
: ORANGE

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SOUTHERN DISTRICT OF NEW YORK, ss.:

RYAN BLUHM, being duly sworn, deposes and says that he is a Court Liaison assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE

On or about December 31, 2019, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, JORDAN PAPACHARALAMBOUS, the defendant, unlawfully, knowingly and willfully operated a motor vehicle upon a public road while knowing, or having reason to know, that his license to operate such motor vehicle in New York was suspended, revoked, or otherwise withdrawn by the commissioner, to wit, the defendant was observed operating his motor vehicle at Stony Lonesome Gate and an investigation revealed that the defendant's state driver's license had been suspended.

(New York Vehicle and Traffic Law, Section 512)

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. On or about December 31, 2019 at approximately 10:56 a.m., MP Officer Pellegrino, was conducting random anti-terrorism measure searches at Stony Lonesome Gate, when a white Toyota Tacoma bearing New York plate 71872 MN, being driven by the defendant, was selected for a vehicle search. The defendant provided a New York driver's license. The defendant's operator's license number was radioed back to the MP desk and a check was conducted. It was discovered that the defendant's license was currently suspended for unpaid fines.
3. The defendant was issued a District Court Violation Notice for operating a motor vehicle while license suspended (DCVN number 8005885/SY10) and was released on his own recognizance.

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.



RYAN BLUHM
Court Liaison

Sworn to before me this
28th day of February, 2020



HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York